

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHRISTINA LESLIE,
*Individually and on behalf of all others
similarly situated,*

Plaintiff,

v.

THOMPSON REUTERS CORPORATION,

Defendant.

Case No: 1:22-CV-07936

Judge Jennifer H. Reardon

JURY TRIAL REQUESTED

**MOTION FOR LEAVE TO FILE
FIRST AMENDED CLASS ACTION COMPLAINT**

Christina Leslie, by and through her undersigned counsel, respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 15, for leave to file the attached Second Amended Class Action Complaint. In support of this motion, Plaintiff states as follows:

1. The Complaint in this matter was filed on September 16, 2022. (ECF No. 1).
2. Defendant filed a motion to dismiss on January 18, 2023. (ECF No. 22).
3. Plaintiff filed an opposition to the motion to dismiss on March 10, 2023. (ECF. No. 35).
4. On September 22, 2023, this matter was stayed pending the resolution of *Salazar v. National Basketball Association*, No. 23-1147 (2d Cir. 2024) (“*Salazar*”). (ECF. No. 60).
5. On October 15, 2024, the Second Circuit vacated the District Court’s decision in *Salazar* and remanded for further proceedings consistent with its opinion.
6. On October 22, 2024, the Parties filed a Joint Letter informing the Court of the opinion in *Salazar*. (ECF. No. 61).
7. On May 1, 2025, the Second Circuit issued its ruling in *Solomon v. Flipps Media, Inc.*, No. 23-7597, 2025 WL 1256641 (2d Cir. May 1, 2025).

8. Defendant filed a Notice of Supplemental Authority on May 8, 2025, informing the Court of the *Solomon* ruling. (ECF. No. 62).

9. Although the Mandate has still not issued, Plaintiff seeks leave to amend based on *Solomon*.¹

10. Good cause exists for Plaintiff to be allowed to file a Second Amended Complaint.

11. According to Rule 15(a)(2) “[t]he court should freely give leave when justice so requires.”

12. Here, given recent developments in VPPA caselaw, notions of justice require that Plaintiff be allowed to fully explain how the ordinary person is able identify an individual’s personally identifiable information.

13. Plaintiff’s proposed First Amended Complaint is attached hereto as Exhibit A (clean) and Exhibit B (redline).

WHEREFORE, Plaintiff requests leave to file a First Amended Class Action Complaint.

Dated: June 12, 2025

Respectfully Submitted:

By: /s/ Michael L. Murphy
Michael L. Murphy (NY 5084397)
BAILEY & GLASSER LLP
1055 Thomas Jefferson Street NW Suite 540
Washington, DC 20007
T: 202.494.3531
mmurphy@baileyglasser.com

Brandon M. Wise – IL Bar # 6319580*
PEIFFER WOLF CARR
KANE CONWAY & WISE, LLP
One US Bank Plaza, Suite 1950

¹ Notably, the Solomon appellants have sought an extension of time to petition for rehearing or rehearing *en banc*. Solomon, No. 23-7597, ECF 44. The deadline for a petition for rehearing or rehearing *en banc* is currently set for June 14, 2025. *Id.*, ECF 46.

St. Louis, MO 63101
T: 314.833.4827
bwise@peifferwolf.com

* admitted *pro hac vice*